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8

9 **UNITED STATES DISTRICT COURT**

10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 HIDDEN EMPIRE HOLDINGS, LLC; a
13 Delaware limited liability company; HYPER
14 ENGINE, LLC; a California limited
liability company; DEON TAYLOR, an
15 individual,

16 Plaintiffs,

17 v.

18 DARRICK ANGELONE, an individual;
19 AONE CREATIVE LLC, formerly known
as AONE ENTERTAINMENT LLC, a
20 Florida limited liability company; and ON
CHAIN INNOVATIONS LLC, a Florida
21 limited liability company,

22 Defendants.

23 Case No. 2:22-cv-06515-MWF-AGR

Assigned to the Hon. Judge Michael W.
Fitzgerald

24

25 **DEFENDANTS' MOTION IN LIMINE
#2 TO PRECLUDE REFERENCE TO
IRRELEVANT AND PREJUDICIAL
ALLEGATIONS**

26 Pretrial Conference: December 22, 2025

27 Trial Date: January 13, 2026

Time: 8:30 AM

Dept.: 5A

1 COMES NOW Defendants and Counterclaimants DARRICK ANGELONE, AONE
2 CREATIVE, LLC, and ON CHAIN INNOVATIONS, LLC (collectively, “AONE”), by
3 and through their attorneys of record, and submit this Motion in Limine No. 2 to preclude
4 Plaintiffs, their counsel, and all witnesses from introducing evidence of, arguing, or
5 making any reference to: (1) The so-called “Icelandic Domains” or any claim that
6 Defendants “hijacked” those domains; (2) Any alleged alter-ego, alias or online persona of
7 Mr. Angelone such as “Jacky Jasper” or “Hollywood Street King”; (3) Alleged “deletion,”
8 “erasure,” “wiping,” “spoliation” or “destruction” of Plaintiffs’ Google Workspace or
9 other electronically stored information (“ESI”) by Defendants, including characterizing
10 this case to the jury as a “spoliation” case; and (4) Any prior lawsuits or default judgments
11 against Mr. Angelone, including the 2015 default judgment in Los Angeles Superior Court
12 Case No. BC509496.

13 This Motion is made pursuant to Federal Rules of Evidence 401, 402, 403, 404(b),
14 608, and 611, Federal Rules of Civil Procedure 26 and 37, the Court’s February 14, 2023
15 Order re Jury Trial, and the Court’s prior orders in this case, including its July 17, 2024
16 Order denying Plaintiffs’ motion for terminating sanctions regarding the Google
17 Workspace and its August 19, 2025 Order denying Plaintiffs’ motion for partial summary
18 judgment.

19 **I. INTRODUCTION**

20 Plaintiffs’ First Amended Complaint, motion practice, and discovery responses
21 confirm they intend to inject several inflammatory “bad character” themes into this trial
22 that have, at most, marginal probative value but pose a substantial risk of unfair prejudice,
23 jury confusion, and mini-trials on collateral issues. These include: (i) allegations that
24 AONE “hijacked” nine so-called “Icelandic Domains”; (ii) allegations that Mr. Angelone
25 is, or was, an anonymous blogger / online persona known as “Jacky Jasper” associated
26 with “Hollywood Street King”; (iii) accusations that Defendants “erased,” “wiped,” or
27 otherwise destroyed Plaintiffs’ Google Workspace environment and “all” of Plaintiffs’
28 data—often framed as “spoliation”—despite this Court’s prior sanctions ruling and the

1 absence of any proof that Defendants deleted anything; and (iv) references to an unrelated
2 Los Angeles Superior Court defamation action and default judgment entered in 2015
3 against Mr. Angelone.

4 The issues for the jury concern the parties' business relationship, the terms and
5 performance of their agreements, ownership and control of certain domains and accounts,
6 and whether Plaintiffs failed to pay for years of executive-level services that AONE
7 actually delivered. None of the above topics makes it more or less likely that any party
8 complied with or breached any duty in this case. They are classic irrelevant "bad acts"
9 themes that serve primarily to invite the jury to decide this dispute based on supposed
10 character and unadjudicated accusations rather than the actual contracts, work performed,
11 payments and non-payments at issue.

12 The risk of unfair prejudice and confusion is particularly acute as to Plaintiffs'
13 spoliation narrative and their repeated sound-bites that Defendants "erased everything,"
14 "wiped" Google Workspace, and "destroyed evidence." The actual record (including
15 AONE's October 13, 2022 compliance declaration, Google correspondence, and the
16 Court-ordered evidentiary hearing) shows: (1) a brief, undisputed billing suspension of
17 Workspace services from August 9–16, 2022; (2) a subsequent transfer of the
18 hiddenempirefilmgroup.com domain and full Workspace control to Plaintiffs by October
19 11, 2022 through FTI Consulting; and (3) competing, unresolved expert opinions about
20 what happened later at Google's end—not any proof that Defendants deleted a single
21 email, document, or Workspace.

22 Allowing Plaintiffs to keep using the rhetoric of "deletion," "erasure," "spoliation,"
23 "hacking," and "destroyed evidence," and to wave around Google-generated "account
24 deleted" notices as if they were findings of intentional misconduct, would simply invite a
25 re-litigation of their failed sanctions motion and a distracting mini-trial over technical
26 issues the Court has already cabined to ordinary fact disputes. Under Rules 401, 403,
27 404(b), 608, and 611, and Rules 26 and 37, the Court should preclude Plaintiffs from
28 using these four categories of "bad acts" themes at trial.

1 **II. RELEVANT GOOGLE WORKSPACE AND DOMAIN TRANSFER**
2 **TIMELINE**

3 Because Plaintiffs' spoliation narrative is central to this Motion, the Court should be
4 guided by the undisputed, documented timeline already in the record:

5 **May–July 2022 – Ongoing Services and Non-Payment.** AONE continued
6 providing executive-level Workspace and digital infrastructure services despite substantial
7 past-due balances.

8 **August 2, 2022 – Notice of Transfer and Outstanding Balance.** On August 2,
9 2022, Angelone emailed HEFG's Sean Miller that "accounts are being closed out and
10 where necessary set up for transfer" and expressly referenced the "current balance,"
11 notifying Plaintiffs that AONE services were being discontinued and that HEFG would
12 need to stand up its own email infrastructure going forward. Sean responded "copy,"
13 acknowledging the notice.

14 **August 9–16, 2022 – Temporary Billing Suspension, Then Restoration.** In
15 written discovery, Defendants admitted that AONE disabled services for Plaintiffs' Google
16 Workspace on **August 9, 2022** due to non-payment, with access suspended until **August**
17 **16, 2022**, when services were restored. (emph. added.) They further explained that this was
18 an administrative billing suspension; no evidence exists that any data was deleted as part
19 of this routine billing process.

20 **September 6–28, 2022 – Google Admin Privileges Dispute; Plaintiffs Using New**
21 **Email.** Google revoked Angelone's admin privileges on September 6, 2022 after a
22 "dispute raised by another party," which Angelone reasonably understood to be HEFG. He
23 immediately responded to Google's Account Recovery Team, again on September 7 and
24 September 13, seeking restoration. Google eventually replied on September 26, 2022 that
25 a CNAME record had been removed and needed to be re-added to resolve the issue.
26 During that period, Angelone twice sent test emails to sean@hiddenempirefilmgroup.com
27 (September 14 and 29) and received an autoreply from Sean stating that the HEFG Google
28 address was "no longer active" and directing all inquiries to

hiddenempirefilm@gmail.com. If Plaintiffs truly had “no access” to email, Sean could not have configured this autoreply or redirected correspondence to a new Gmail account.

September 30, 2022 – Preliminary Injunction and Compliance Order. The Court issued its preliminary injunction and compliance directions regarding Workspace, domains, and social media.

October 3–5, 2022 – FTI Coordination; Domain Transfers; FTI Confirms AONE Never Owned Certain Domains. On October 3, 2022, Angelone met with Plaintiffs’ retained transfer firm, FTI Consulting, and agreed that the fastest way to comply was for FTI to create a new HEFG Namecheap account so ownership of the domains could be transferred. By October 4, the process was completed, and FTI confirmed the transfers. On October 5, 2022, FTI confirmed that Plaintiffs agreed AONE “never owned or controlled” several domains Plaintiffs had previously accused Angelone of hijacking (e.g., hefg.com, climb.org, fearthemovie.com, factsnotpolitics.com, 2getherwewillsavelives.com, hiddenempireentertainment.com).

October 4–11, 2022 – Transfer of Domains, Social Media, and Google Workspace Control to Plaintiffs. As of October 4, 2022, Angelone had transferred ownership of the hiddenempirefilmgrou.com and hiddenempirefilms.com domains into the Namecheap account “roxanneavent” supplied by FTI, and provided passwords for HEFG’s Twitter and Instagram accounts. By October 4, HEFG’s Facebook page ownership had been transferred to the HEFG Business Manager account that FTI provided. Admin access to the remaining Facebook pages listed in the Order was also provided.

As of October 4, Plaintiffs had been granted full administrator access and control over a long list of film and project domains (Fatale, The Intruder, Traffik, Meet The Blacks, The House Next Door, Supremacy, Fear, Free Agents, Hoop2, CLIMB, Black History in Two Minutes, BeWoke.Vote, HyperEngine, etc.), all confirmed by FTI.

By October 11, 2022, FTI confirmed that HEFG had full, exclusive control of the Google Workspace account.

1 **October 5–10, 2022 – Google’s Own Billing / Account Notices.** In response to
2 Plaintiffs’ interrogatories, Defendants identified Google support emails stating that on
3 October 5, 2022 the Google Workspace Business Plus subscription was “suspended due to
4 a billing issue,” making services unavailable; that on October 9 Google would “revert
5 account changes within 72 hours”; and that on October 10 Google reported the account
6 changes had been reverted but “the account had been deleted.” Defendants expressly
7 noted they remain unclear what, if anything, Google ultimately did with the Workspace
8 after that date.

9 **Technical Record – No Log of Any Admin “Delete Workspace” Action by**
10 **Angelone.** The Google audit logs produced in the course of discovery capture user and
11 admin activity from May 11, 2022 through October 7, 2022. As Defendants’ expert Rick
12 Watts explained, any admin-driven deletion of the Workspace would appear in the admin
13 audit logs associated with the admin account used. Those logs contain no such deletion
14 event and simply end after October 7, consistent with Google shutting down the
15 environment. Against this timeline, Plaintiffs’ continued insistence that “Defendants
16 deleted Workspace,” “erased everything,” or “spoliated evidence” is unsupported by any
17 log event, and certainly not by any finding of the Court. The Court already denied
18 terminating sanctions, expressly noting that the record is insufficient to attribute any
19 Workspace deletion to Defendants, and crediting Mr. Watts’s conclusion that there is no
20 direct log proof tying Mr. Angelone to any Workspace deletion event.

21 **III. LEGAL STANDARD**

22 Evidence is admissible only if it is relevant, meaning it has any tendency to make a
23 fact of consequence more or less probable. Fed. R. Evid. 401–02. Even relevant evidence
24 may be excluded “if its probative value is substantially outweighed by a danger of ...
25 unfair prejudice, confusing the issues, misleading the jury, undue delay, [or] wasting
26 time.” Fed. R. Evid. 403.

27 Evidence of other acts “to prove a person’s character in order to show that on a
28 particular occasion the person acted in accordance with the character” is inadmissible.

Fed. R. Evid. 404(b)(1). Impeachment by specific instances of alleged conduct is strictly limited under Rules 608(b) and 611(b).

Rule 26 requires timely disclosure of the documents and ESI a party intends to rely upon at trial, and Rule 37(c)(1) provides an automatic preclusion remedy for information not disclosed. The Court's February 14, 2023 Order re Jury Trial likewise directs that motions in limine address concrete evidentiary issues rather than re-litigating dispositive motions.

IV. ARGUMENT

A. References to "Icelandic Domains" and Non-HEFG Domains are Irrelevant and Highly Prejudicial

The Court has already addressed Plaintiffs' "Icelandic domains" theory in the sanctions and summary-judgment context, and the transfer record now makes clear that AONE either never owned those domains or transferred everything it did control. The FTI-supervised process culminated in October 5, 2022 with Plaintiffs' agreement that AONE "never owned or controlled" multiple domains they had previously accused Angelone of hijacking.

Whatever remains of the "Icelandic" narrative is, at best, a collateral dispute about overseas registrations that are not at issue in this case and have no bearing on whether AONE breached any duty to Plaintiffs. Allowing Plaintiffs to re-litigate those allegations in front of the jury would spawn a mini-trial over foreign DNS records and registrar practices, confuse the issues, and invite the jury to punish Defendants for supposed "hacking" that has already been rejected as a basis for terminating sanctions. Under Rules 401, 403, and 404(b), all evidence and argument about the "Icelandic domains" should be excluded.

B. "Jacky Jasper / Hollywood Street King" and Similar Online-Persona Allegations Are Classic 404(b) "Bad Acts" With No Probative Value

Plaintiffs' effort to paint Mr. Angelone as a shadowy online persona ("Jacky Jasper" / "Hollywood Street King") is pure character assassination. Even taken at face value, those

1 accusations say nothing about the parties' contracts, payments, or domain/Workspace
2 administration for Hidden Empire. They would require the parties to call additional
3 witnesses and experts to litigate who did or did not run a gossip site years ago, and they
4 invite jurors to infer that a supposed "internet troll" must also be a bad business partner
5 here.

6 That is precisely what Rules 404(b), 608(b), and 403 prohibit. The Court should
7 preclude any mention of "Jacky Jasper," "HSK," or similar online-persona theories at trial.

8 **C. "Spoliation," "Erasure," and "Deletion" Rhetoric About Google**
9 **Workspace and Documents Should Be Excluded or Strictly Cabined**
10 This is the core integration point for the Workspace-and-documents issues.
11 **The Court has already found the record insufficient to attribute any**
12 **Workspace deletion to Defendants.**

13 After full briefing and an evidentiary hearing with live expert testimony, the Court
14 denied Plaintiffs' motion for terminating sanctions premised on alleged Workspace
15 deletion and spoliation. The Court credited Watts's analysis that there is no direct log
16 evidence of a delete-Workspace action by Angelone and found the record insufficient to
17 impose sanctions.

18 Plaintiffs now propose to use the same ambiguous technical evidence—and the
19 same inflammatory vocabulary ("spoliation," "erased everything," "wiped Workspace")—
20 to inflame the jury and relitigate a sanctions theory the Court has already rejected. That is
21 the definition of unfair prejudice and confusion. Fed. R. Evid. 403.

22 **The evidence differentiates three distinct things that Plaintiffs repeatedly**
23 **conflate**

24 The record draws a clear line between:

25 **(1) AONE's temporary billing-related suspension of Workspace services from**
26 **August 9–16, 2022.** AONE has admitted this limited suspension due to non-payment and
27 made clear that it was an administrative billing action, not a deletion of any content.

1 **(2) Google's own automated account-status emails in early October 2022.**

2 Google support messages indicate a billing-related suspension on October 5, a plan to
3 “revert account changes within 72 hours” on October 9, and a subsequent message on
4 October 10 that changes had been reverted but “the account had been deleted.” Defendants
5 were not the ones sending these emails; they simply reported what Google said, while
6 expressly acknowledging they “remain unclear” what Google ultimately did on its end.
7

8 **(3) Plaintiffs' rhetoric that Defendants “erased everything,” “destroyed**
9 **evidence,” and “wiped” Workspace.** This rhetoric appears in depositions and discovery
10 responses whenever Plaintiffs are asked to explain missing financial records or internal
11 documents, even where third-party subpoenas later produced the very records they
12 claimed had been “erased.”

13 Conflating these three categories, then telling the jury “Defendants deleted
14 Workspace and destroyed our evidence”, adds nothing probative. It simply invites
15 speculation about conduct the Court has refused to sanction and that the logs do not show.

16 **Plaintiffs had repeated notice and ample opportunity to preserve their data,**
and the record shows that critical documents were never actually lost.

17 The compliance declaration and third-party productions confirm the following facts:
18 (i) Plaintiffs were expressly notified on August 2, 2022 that accounts were being closed
19 out “and where necessary set up for transfer,” and that AONE’s Workspace services were
20 being discontinued due to a “current balance”; (ii) Plaintiffs had their Workspace services
21 restored on August 16, 2022 and, by October 11, 2022, had full, exclusive control of
22 Workspace and associated domains and social accounts, as confirmed by their own vendor
23 FTI; (iii) During the supposed “lockout,” Plaintiffs were already forwarding emails to a
24 new Gmail address (hiddenempirefilm@gmail.com) and had configured autoreplies
25 telling senders to use that address, proving they had ongoing access to email and could
26 preserve communications if they chose; (iv) The “everything was erased” refrain is belied
27 by neutral third-party productions: banks produced complete statements and wire records
28

1 after Deon Taylor testified all bank records had been “erased,” and ISPs produced logs
2 showing continued access even after Plaintiffs claimed total lockout.
3

4 Even if Google removed the old Workspace tenant at some point after October 7,
5 2022, the record shows that (i) Plaintiffs had multiple months’ notice and multiple avenues
6 to preserve their documents; and (ii) critical categories of records they claim were
7 “erased” in fact exist at their banks, ISPs, and other vendors—and were obtained by
8 Defendants, not Plaintiffs. There is thus no basis to suggest to the jury that Defendants
9 actually destroyed unique or irreplicable evidence. Allowing Plaintiffs to use spoliation
10 rhetoric under these circumstances would be grossly misleading. See FRE 403, 611.

11 **The distinction between alleged “Workspace deletion” and alleged “document**
deletion” matters, and Plaintiffs have failed to prove either.

12 Technically, the alleged “Workspace deletion” is a platform-level event (removal of
13 a tenant) controlled by Google; “document deletion” refers to specific emails or files
14 being deleted by a user. The Google audit logs and Watts’s analysis address the first;
15 Plaintiffs have never identified, with specificity, any particular email, document, or file
16 that was actually deleted by Defendants, and that cannot be reproduced from another
17 source.

18 Yet, Plaintiffs repeatedly conflate the two, telling a story that “Angelone erased our
19 entire Workspace and all of our data,” and offering that story as an excuse for their
20 inability to produce even basic corporate records (e.g., bank statements, vendor payments,
21 Hyper Engine financials), which were ultimately produced in response to defense
22 subpoenas.

23 This is not a legitimate evidentiary theory, but rather narrative that has already failed
24 when this Court denied Plaintiff’s sanctions motion. The Court should not allow it to be
25 recycled as “background” for the jury.

26 **Under Rules 403, 404(b), and 37, the “spoliation” theme should be excluded or**
tightly limited.

27 Given the foregoing, AONE requests that the Court:
28

(I) Preclude Plaintiffs, their counsel, and witnesses from using the terms “spoliation,” “erased everything,” “wiped Workspace,” “destroyed evidence,” or similar phrasing suggesting that the Court has found, or that the evidence proves intentional destruction by Defendants;

(II) Preclude Plaintiffs from arguing that any inability to produce records at trial is because “Defendants deleted Workspace” unless they can establish a proper foundation outside the presence of the jury, including identifying the specific record, its prior existence, and why it cannot be obtained from banks, vendors, or other third-party sources; and

(III) Preclude Plaintiffs from introducing or relying on Google's generic billing/account-status emails as if they were evidence of deliberate misconduct by Defendants, rather than automated notices from Google.

Such a ruling would not prevent Plaintiffs from arguing about whatever records they can or cannot produce. It would simply prevent them from weaponizing the word “spoliation” and the Court’s prior orders to suggest misconduct that has not been—and cannot be—proven.

D. Prior Default Judgments and Unrelated Litigation Are Inadmissible Character Evidence

Finally, Plaintiffs should be precluded from referencing the 2015 default judgment in Los Angeles Superior Court Case No. BC509496, or any other unrelated lawsuit or allegation against Mr. Angelone. Whatever occurred in an unrelated defamation case a decade ago has no bearing on the parties' contracts, payments, or technical administration in this case. It is classic 404(b) character evidence and would serve only to invite the jury to punish Mr. Angelone for unrelated conduct.

Any minimal probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, and wasting time. Fed. R. Evid. 403, 404(b), 608.

V. CONCLUSION

1 For the foregoing reasons, Defendants respectfully request that the Court grant Motion in
2 Limine No. 2 and order that Plaintiffs, their counsel, and all witnesses be precluded from:

- 3 1. Mentioning, referring to, or introducing evidence concerning the so-called
4 “Icelandic domains” or any accusation that Defendants “hijacked” those domains;
- 5 2. Mentioning, referring to, or introducing evidence concerning any alleged online
6 persona of Mr. Angelone such as “Jacky Jasper” or “Hollywood Street King”;
- 7 3. Characterizing this case to the jury as involving “spoliation,” “erasure,” “wiping,”
8 or “destruction” of Google Workspace or other ESI by Defendants, or using similar
9 rhetoric suggesting the Court has found intentional destruction, absent a specific,
10 non-speculative evidentiary foundation vetted outside the jury’s presence; and
- 11 4. Mentioning, referring to, or introducing evidence concerning prior lawsuits or
12 default judgments against Mr. Angelone, including Los Angeles Superior Court
13 Case No. BC509496.

14 Nothing in this Order should limit AONE’s ability to cross-examine Plaintiffs’
15 witnesses or experts using documents that were produced in discovery or obtained from
16 third parties, or to rely on the Court’s sanctions ruling and related technical record to rebut
17 any suggestion that Defendants destroyed evidence.

18 **Dated: December 1, 2025**

19 **LAW OFFICES OF J.T. FOX,
A Professional Corporation**

20
21 By:



22 J.T. Fox, Esq.

23 Attorney for Defendants and
24 Counterclaimants, DARRICK
25 ANGELONE; AONE CREATIVE, LLC,
26 AND ON CHAIN INNOVATIONS, LLC

CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of 18 and not a party to this action; my business address is 556 S. Fair Oaks Ave, No. 444, Pasadena, CA 91105. My email address is justin@jtfolex.com.

I certify that on December 1, 2025, I served: **DEFENDANTS' MOTION IN LIMINE #2 TO PRECLUDE REFERENCE TO IRRELEVANT AND PREJUDICIAL ALLEGATIONS** on the following parties or counsel of record as follows:

<p>Felton T. Newell, Esq. Newell Law Group PC 1801 Century Park East, 24th Floor Phone (310) 556-9663 E-mail: felton@newellpc.com; christine@newellpc.com</p>	<p><i>Counsel for Plaintiffs</i></p>
<p>Jeffrey S. Kramer, State Bar No. 094049 Sandra Calin, State Bar No. 100444 KRAMER, DEBOER & KEANE A Limited Liability Partnership Including Professional Corporations 27001 Agoura Road, Suite 350 Calabasas, California 91301 Tel: (818) 657-0255 - Fax: (818) 657-0256 jkramer@kdeklaw.com; scalin@kdeklaw.com</p>	<p><i>Co-Counsel for Defendants</i></p>

By ECF/CM: I electronically filed an accurate copy using the Court's Electronic Court Filing ("ECF") System and service was completed by electronic means by transmittal of a Notice of Electronic Filing on the registered participants of the ECF System.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed at Pasadena, California on December 1, 2025

/s/Justin Kian
Justin Kian